

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

MAXEL THOMASON,)
)
)
Plaintiff,)
)
)
vs.) CIVIL ACTION NO.
) 6:18-CV-00809-TMC
CONN APPLIANCES, INC.,)
)
)
Defendant.)
)

MOTION TO STAY PENDING ARBITRATION

The Plaintiff submits this Motion to Stay Pending Arbitration, requesting that the Court stay all proceedings related to this Matter and compel arbitration. In support of this Motion, the Plaintiff states:

1. Plaintiff commenced this action by filing a Complaint against Defendant on March 23, 2018.
2. The Plaintiff agrees to arbitrate all of the claims pursuant to an Agreement between the parties containing a binding arbitration clause attached as Exhibit “A.”
3. This matter shall be submitted for arbitration with the American Arbitration Association (“AAA”).

4. Defendant will pay the fees charged by AAA, the Administrator and the Arbitrator required to be paid by Defendant under the terms of the Arbitration Agreement set forth in Exhibit A.

5. The Plaintiff therefore respectfully requests this Court enter the Stipulated Order Compelling Arbitration, which orders all claims be submitted to arbitration and that this lawsuit be stayed, with the Court reserving jurisdiction to enforce the final award of the Arbitrator.

6. Pursuant to Local Rule 7.02 I have conferred with opposing counsel, who despite not having appeared in this case, consents to this request. Counsel for Defendant, Stefanie H. Jackman, is barred in Georgia, agrees to this Motion, and is receiving service of this Motion.

A proposed order is attached to this Motion for the Court's convenience.

Dated: April 19, 2018

/s/ *Dave Maxfield*
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Counsel for Plaintiff Maxel Thomason

CERTIFICATE OF SERVICE

I hereby certify that on this day, I served the foregoing Joint Motion to Stay Pending Arbitration on the Clerk of Court and all parties of record by U.S. Mail and/or by using the CM/ECF system:

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Dated: April 19, 2018